

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

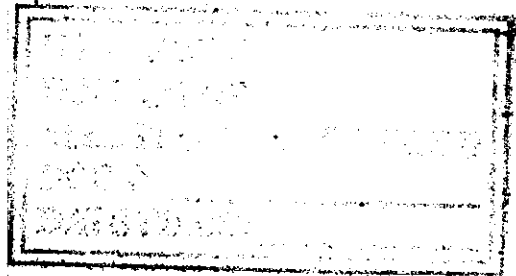
- v. -

PLUTARCO ANGULO-AGUIRRE,
a/k/a "Matatan,"
a/k/a "Platano,"
RAFAEL RODRIGUEZ,
a/k/a "Dance,"
ANGEL DIAZ,
a/k/a "Pete,"
VICTOR DIAZ,
a/k/a "Gago,"
JUAN CAMACHO,
SAILE PARRA, and
JORGE CEDENO,
a/k/a "Miguel,"

Defendants.

**SEALED
SUPERSEDING
INDICTMENT**

S4 07 Cr. 387 (CLB)



COUNT ONE

KIDNAPPING CONSPIRACY

The Grand Jury charges:

1. From in or about September 2006 through in or about January 2007, in the Southern District of New York and elsewhere, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," SAILE PARRA, and JORGE CEDENO, a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with

each other to violate the laws of the United States.

2. It was a part and an object of the conspiracy that PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," SAILE PARRA, and JORGE CEDENO, a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, would and did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, and did travel in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 13, 2006, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," and VICTOR DIAZ, a/k/a "Gago," together with others known and unknown to the Grand Jury, kidnapped two individuals in or around Blauvelt, New York, and transported them to in or around Clifton, New Jersey.

b. On or about November 13, 2006, RAFAEL RODRIGUEZ, a/k/a "Dance," SAILE PARRA, JORGE CEDENO, a/k/a

"Miguel," the defendants, together with others known and unknown to the Grand Jury, kidnapped an individual in or around Allamuchy Township, New Jersey, and transported that individual to in or around the Bronx, New York.

c. On or about November 14, 2006, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," VICTOR DIAZ, a/k/a "Gago," SAILE PARRA, and JORGE CEDENO, a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, kidnapped an individual in or around Pine Grove, Pennsylvania, and traveled to in or around Paterson, New Jersey.

(Title 18, United States Code, Section 1201(c).)

KIDNAPPINGS

COUNT TWO

The Grand Jury further charges:

4. On or about September 13, 2006, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, and did travel in interstate commerce, to wit, the defendants forced two individuals into the sleeping compartment of their truck in or

around Blauvelt, New York, and drove them to in or around Clifton, New Jersey.

(Title 18, United States Code, Section 1201(a(1)) and 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about November 13, 2006, RAFAEL RODRIGUEZ, a/k/a "Dance," SAILE PARRA, JORGE CEDENO, a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away for ransom and reward and otherwise persons, and did transport that person in interstate commerce, and did travel in interstate commerce, to wit, the defendants forced an individual into the sleeping compartment of the individual's truck in or around Allamuchy Township, New Jersey, and drove that individual to the Bronx, New York.

(Title 18, United States Code, Section 1201(a(1)) and 2.)

ARMED ROBBERY CONSPIRACY

COUNT FOUR

The Grand Jury further charges:

6. From in or about September 2006 through in or about January 2007, in the Southern District of New York and elsewhere, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," SAILE PARRA, and JORGE CEDENO,

a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, three armed robberies of trucks in or around Blauvelt, New York, Allamuchy Township, New Jersey, and Pine Grove, Pennsylvania, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a).)

ARMED ROBBERIES

COUNT FIVE

The Grand Jury further charges:

7. On or about September 13, 2006, in the Southern District of New York and elsewhere, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," ANGEL DIAZ, a/k/a "Pete," VICTOR DIAZ, a/k/a "Gago," and JUAN CAMACHO, the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, armed robbery of two truck drivers, in or around Blauvelt, New York, of a truckload of perfume, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section

1951(b)(3).

(Title 18, United States Code, Section 1951(a) and 2.)

COUNT SIX

The Grand Jury further charges:

8. On or about November 13, 2006, in the Southern District of New York and elsewhere, RAFAEL RODRIGUEZ, a/k/a "Dance," SAILE PARRA, JORGE CEDENO, a/k/a "Miguel," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, armed robbery of a truck driver, in or around Allamuchy Township, New Jersey, and in or around the Bronx, New York, of cellular phones contained inside the truck, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a) and 2.)

FIREARMS COUNTS

COUNT SEVEN

The Grand Jury further charges:

9. On or about September 13, 2006, in the Southern District of New York and elsewhere, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," a/k/a "Platano," RAFAEL RODRIGUEZ, a/k/a "Dance," and ANGEL DIAZ, a/k/a "Pete," the defendants, unlawfully, willfully, and knowingly used and carried firearms,

during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the violations of Title 18, United States Code, Sections 1201 and 1951 as charged in Counts One, Two, Four, and Five of this Indictment, and possessed firearms in furtherance of such crimes, which firearms were brandished, to wit, the defendants brandished firearms while subduing two truck drivers, transporting them over state lines, and robbing them of the contents of their truck.

(Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.)

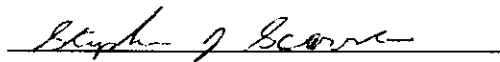
COUNT EIGHT

The Grand Jury further charges:

10. On or about November 13, 2006, in the Southern District of New York and elsewhere, RAFAEL RODRIGUEZ, a/k/a "Dance," and JORGE CEDENO, a/k/a "Miguel," the defendants, unlawfully, willfully, and knowingly used and carried firearms, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the violations of Title 18, United States Code, Sections 1201 and 1951 as charged in Counts Three and Six of this Indictment, and possessed firearms in furtherance of such crimes, which firearms were brandished, to wit, the defendants brandished firearms while subduing a truck driver, transporting the truck

driver over state lines, and robbing the truck driver of some of the contents of the truck.

(Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney